1 THE HONORABLE BARBARA J. ROTHSTEIN 2 3 4 5 6 7 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 NICOLE YOUNT, individually and on Case No. 2:24-cy-00534-BJR 10 behalf of all others similarly situated, STIPULATION AND ORDER FOR A STAY 11 OF EARLY CASE DEADLINES Plaintiff, 12 v. 13 WHOLE FOODS MARKET PACIFIC 14 NORTHWEST, INC., a foreign profit 15 corporation doing business as WHOLE FOODS MARKET; WFM-WO, INC., a 16 foreign profit corporation doing business as WHOLE FOODS MARKET; WHOLE 17 FOODS MARKET SERVICES, INC., a foreign profit corporation doing business as 18 WHOLE FOODS MARKET; and DOES 1-19 20, 20 Defendants. 21 22 23 **STIPULATION** 24 Defendants Whole Foods Market Pacific Northwest, Inc., WFM-WO, Inc., and Whole 25 Foods Market Services, Inc., on the one hand, and Plaintiff Nicole Yount, on the other hand, hereby 26 MORGAN, LEWIS & BOCKIUS LLP STIPULATION AND ORDER ATTORNEYS AT LAW FOR A STAY OF EARLY CASE DEADLINES 1301 SECOND AVENUE, SUITE 3000(Case No.: 2:24-cv-00534-BJR) – 1 SEATTLE, WASHINGTON 98101 TEL (206) 274-6400 FAX (206) 274-6401

STIPULATE AND AGREE to request that the Court stay the deadlines for an FRCP 26(f) conference, initial disclosures, and joint status report, until a reasonable time after the Court issues 2 a decision on Defendants' Motion to Dismiss, filed June 13, 2024, and Plaintiff's Motion to 3 Remand, filed June 18, 2024. Dkts. 16, 18. The stipulated stay of deadlines would promote 4 5 efficiency for the parties and the Court. This stipulation and order shall not operate as an admission of any factual allegation or legal conclusion, nor shall it operate as a waiver nor otherwise affect 6 7 any right, defense, claim or objection. IT IS SO STIPULATED. 8 9 DATED this 25th day of June, 2024. 10 EMERY | REDDY, PLLC MORGAN, LEWIS & BOCKIUS LLP By: *s/Timothy W. Emery* By: s/ Damon C. Elder 12 Timothy W. Emery, WSBA No. 34078 Damon C. Elder, WSBA No. 29413 Patrick B. Reddy, WSBA No. 34092 Claire M. Lesikar, WSBA No. 60406 13 Paul Cipriani, WSBA No. 59991 1301 Second Avenue, Suite 3000 14 600 Stewart Street, Suite 1100 Seattle, WA 98101 Seattle, WA 98101 Phone: (206) 274-6400 15 Phone: (206) 442-9106 Email: damon.elder@morganlewis.com Email: emeryt@emeryreddy.com claire.lesikar@morganlewis.com 16 reddyp@emeryreddy.com paul@emeryreddy.com 17 Attorneys for Defendants Whole Foods Market Pacific Northwest, Inc.; WFM-WO, Inc.; and 18 Whole Foods Market Services, Inc. Attorneys for Plaintiff Nicole Yount 19 20 21 22 23 24 25 26

STIPULATION AND ORDER FOR STAY OF EARLY CASE DEADLINES (Case No.: 2:24-cv-00534-BJR) -2

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**ORDER** 1 IT IS SO ORDERED. The Court HEREBY STAYS the deadlines for the 26(f) conference, 2 initial disclosures, and joint status report until 60 days after the Court rules on Defendant's Motion 3 to Dismiss and Plaintiff's Motion to Remand. 4 5 6 DATED: June 26, 2024. 7 8 9 10 THE HONORABLE BARBARA J. ROTHSTEIN UNITED STATES DISTRICT JUDGE 11 12 Presented by: 13 MORGAN, LEWIS & BOCKIUS LLP 14 15 By: s/ Damon C. Elder Damon C. Elder, WSBA No. 46754 16 Claire M. Lesikar, WSBA No. 60406 1301 Second Avenue, Suite 3000 17 Seattle, WA 98101 Phone: (206) 274-6400 18 Email: damon.elder@morganlewis.com claire.lesikar@morganlewis.com 19 20 Attorneys for Defendants Whole Foods Market Pacific Northwest, Inc.; WFM-WO, Inc.; and Whole Foods 21 Market Services, Inc. 22 23 24 25 26 MORGAN, LEWIS & BOCKIUS LLP STIPULATION AND ORDER

FOR STAY OF EARLY CASE DEADLINES

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STIPULATION AND ORDER FOR STAY OF EARLY CASE DEADLINES (Case No.: 2:24-cv-00534-BJR) – 4

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